



EDWARD M. KRATT

ATTORNEY AT LAW  
350 BROADWAY, SUITE 1202  
NEW YORK, NY 10013  
(212) 941-1277  
FAX # (212) 274-1189

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By Hand

January 15, 2010

The Honorable Denise Cote  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, N.Y. 10007

**MEMO ENDORSED**

Re: United States of America v. Thomas T. Prousalis  
03 Cr. 1509 (DC)

Dear Judge Cote:

I am the attorney, appointed pursuant to the Criminal Justice Act, for the defendant, Thomas T. Prousalis, in the above-referenced Post-Release Supervision matter.

Pursuant to the Court's previous suggestion, I had spoken with AUSA Seetha Ramachandran with a view toward resolving this matter without the need for further litigation and/or an evidentiary hearing, now scheduled for January 27, 2010 at 2:00 P.M.

To that end, I had respectfully requested that the defense submissions be extended to January 18, 2010, with the Government's Response due by January 22, 2010. That request was made to enable the parties to continue to work toward an amicable resolution of this matter.

However, at this point, no resolution has been reached. Mr. Prousalis' presence in Albania for business travel has not permitted substantive discussions regarding the Restitution issues herein.

Moreover, this morning I was informed by AUSA Ramachandran that U.S. Probation intended to file additional Violations against Mr. Prousalis, unrelated to the Restitution issues.

Given the above circumstances, the parties agree that an adjournment of the January 27, 2010 would be appropriate at this time.

Hence, the defense requests that this matter be adjourned to **the week of February 22, 2010 (with the exception of February 23, 2010)**.

AUSA Ramachandran is in agreement with the above defense request.

Thank you for your consideration in this matter.

Sincerely,

*Edward M. Kratt*

Edward M. Kratt

cc: AUSA Seetha Ramachandran  
Via Facsimile, 212-637-2620

*The conference is adjourned  
to 2/26/10 at  
noon. Defense  
submissions are due  
2/12/10; Gov't  
submissions are  
due 2/19/10.*

*Edward M. Kratt  
January 15, 2010*

COPIES SENT TO

Seetha Ramachandran  
Assistant United States Attorney  
One Saint Andrew's Plaza  
New York, NY 10007

Edward M. Kratt  
Attorney At Law  
350 Broadway, Suite 1202  
New York, NY 10013

U.S. Probation Department  
Attn: Margaret A. Carroll